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January 17, 2025

VIA ECF

The Honorable Jennifer H. Rearden, U.S.D.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Tecspect LLC, et al. v. Michael Donnolo, et al.*
Civil Action No. 24 Civ. 8077 (JHR)

Dear Judge Rearden:

This office represents Plaintiffs in the above-captioned matter. We are writing to the Court jointly with Defendants' counsel to provide Your Honor with a status update regarding Defendants providing Plaintiffs with the information and access necessary to operate Tecspec LLC, as directed by Your Honor during the January 13, 2025 hearing.

The parties have agreed to attend a video conference on January 23, 2025 at 10:00 am. Rob Senia, along with three IT personnel and two machine operators will be attending on behalf of Plaintiffs, and M. Donnolo, Mr. Long, and J. Donnolo will be attending on behalf of Defendants.

On January 15, 2025 and on January 17, 2025, Plaintiffs provided Defendants with a list of what remained outstanding. A copy of the January 15, 2025 correspondence and the January 17, 2025 correspondence are attached hereto respectively as **Exhibit A** and **Exhibit B**.



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One issue remains in dispute. Plaintiffs are requesting that this January 23, 2025 video conference be recorded. The reason for this request is twofold: (i) so that Plaintiffs may refer to the recording while resuming operations and to prevent the need to request that Defendants repeat certain instructions; and (ii) to ensure that neither party is able to misrepresent what was and was not provided during the video conference. Defendants object to this request due to the alleged history of threats by the individual plaintiffs against the individual defendants, which Plaintiffs deny. Furthermore, the potential for any misrepresentation is a non-issue since Plaintiffs have agreed to identify beforehand any outstanding items and both sides will ensure that all persons necessary to make this a meaningful exchange of information, including Michael Donnolo, John Michael Long, and Joshua Donnolo who have all already confirmed their availability, will be present on the January 23, 2025 virtual meeting.

Plaintiffs are thus respectfully requesting that this Court order that the January 23, 2025 video conference between the parties be recorded.

To the extent that the parties are unable to resolve the issues they are attempting to resolve on January 23, 2025, Plaintiffs reserve their rights to seek court intervention with respect to same.

As always, we thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Jason R. Melzer

Jason R. Melzer

JRM

cc: Matthew S. Blum, Esquire (Via ECF)
Jay H. Min, Esquire (Via ECF)